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Return Date: January 19, 2023 Objection Deadline: December 14, 2022 Reply Deadline: January 18, 2023

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

WANSDOWN PROPERTIES CORPORATION, N.V.,

Debtor.

WANSDOWN PROPERTIES CORPORATION, N.V.,

Plaintiff-Respondent,

v. AZADEH NASSER AZARI,

Defendant-Appellant.

Chapter 11

Case No. 19-13223 (DSJ)

Adv. Pro. No. 19-1450 (DSJ)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon (i) the Notice of Appeal and Statement Of Election, with attached exhibits; (ii) Notice Of Motion Under Federal Bankruptcy Rule 8004, 28 U.S.C. § 158, and 28 U.S.C. § 1292(b) For Leave To Appeal From An Interlocutory Order, dated November 30, 2022 (the "Motion"), (iii) the Memorandum Of Law In Support Of Defendant-Appellant Azadeh Nasser Azari's ("Azari") Motion, dated November 30, 2022, (iv) the Declaration of Nader Mobargha, Esq. In Support of Azari's Motion, dated November 30, 2022, and attached exhibits, Azari will move, before the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-0174, on January 19, 2023 at 10:00 a.m., under

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Federal Bankruptcy Rule 8004, 28 U.S.C. § 158, and 28 U.S.C. § 1292(b) for leave to appeal from

the bankruptcy court's interlocutory order, and for such other and further relief as the Court deems

just and proper.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion

("Objections") must be in writing, and shall be filed no later than December 14, 2022 under Federal

Bankruptcy Rule 8004.

PLEASE TAKE FURTHER NOTICE that any replies to Defendant's Objections shall

be in writing, and filed no later than January 18, 2023.

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed or served,

on or before the Objections deadline, Azari may, after the Objections deadline, submit to the

district court a proposed order with no further notice or opportunity to be heard.

Dated: November 30, 2022 New York, New York

> Respectfully submitted, Nader Mobargha

Nader Mobargha

Alison Moss

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